

The following combines comments from our three (3) permitted facilities in Washington State: Kenworth Trucks (KW) in Renton, PACCAR in Tukwila and PACCAR Technical Center in Mt Vernon. These comments reflect operation and logistic concerns at the three facilities.

Generally speaking, the new quarterly sampling and reporting requirements will be burdensome and costly for any manufacturing facility. We propose that those who demonstrate Best Management Practices and have installed stormwater pollution control systems should not be subject to the requirement of quarterly sampling and analysis. Such frequent sampling should only be required of manufacturing facilities that do not take these pro-active steps to prevent stormwater contamination. The existing permit already requires semi-annual inspections during the wet season between October 1 and April 30 and the other during the dry season of May 1 and September 30. We recommend semi-annual sampling during those inspections which should capture the dry and wet season effluent discharge quality. We further recommend reports only be required to be submitted to the agency when the discharge exceeds the discharge limit. Otherwise, the reports shall be kept on site and be available for review during any Ecology inspections.

The permit proposes that the permittee may suspend monitoring for a listed parameter if eight consecutive analyses fail to detect the presence of the parameter. To reduce costs and still provide assurances of water quality, we suggest that after four consecutive analyses with no parameter exceedences of discharge standards, monitoring reports shall be kept on site and be available for review during any Ecology inspections.

In addition, the draft permit requires that the storm event for the quarter must be preceded by at least 24 hours of no rainfall and the sample taken within the first 30 minutes of the storm event. This timeframe requirement for sampling is excessively costly because it is logistically difficult in the rainy Northwest. With our facilities, we have two extremes. One has stormwater discharge locations that are nearly always flowing especially during the winter months. The first 30 minutes of a storm would not be the first 30 minutes of discharge from the facility. Conversely, the gravity fed retention pond at another facility could be dry especially during the summer months making sampling impossible. With retention ponds stormwater run-off is accumulated and mixed in the pond during the course of the storm, and therefore, the sampling time is not critical in determining the quality of the off-site discharge. We propose that facilities should sample at any time during the storm event or clarification be made for continuous flow and retention ponds.

Section S3 references Impaired Waterbodies on State's 303(d) list. According to this listing, Padilla Bay (a facility receiving waterbody) is listed for PCBs only. This is not a Water Quality Standard supported by the Industrial Stormwater General Permit. The baseline requested stormwater sample analysis will not address soil sediment PCB levels. Lake Washington is on the 303(d) Impaired Waters list for fecal coliform only. The requested sample analysis for pH, turbidity, zinc, and oil & grease will not give results for fecal coliform. We therefore recommend that required monitoring be for relevant pollutants only in terms of the specific 303(d) listing criteria for receiving waterbodies and the potential contaminants of concern that are stored at a given facility.

Section S9 which addresses the SWPPP (Stormwater Pollution Prevention Plan) states that the facility assessment must be as complete as possible and must be updated to reflect changes at the facility. This is an ambiguous requirement and could be overly burdensome if non-substantive changes at the facility require SWPPP revisions. We recommend an annual review by a "competent person" and revisions of "substantive" descriptions and changes to the SWPPP as needed. We also suggest providing general descriptions of the types of products stored at the facility instead of complete inventories of each material stored onsite. For example, we recommend general descriptions of types of chemical products and ranges of quantities stored or transferred outside at the facility.

Under General Conditions G2, it states that "the permittee shall at all times properly operate and maintain facilities and systems of collection, treatment, and control...." For a variety of reasons, stormwater equipment may stop operating and/or require repair and maintenance. We recommend rephrasing this paragraph to "the permittee shall properly operate and maintain all facilities and systems in accordance with good industrial practices...." and that an allowance be made for emergency or reasonable repair and maintenance of equipment.

PACCAR Inc promotes Best Management Practices and wants to join the community in protecting our waterbodies.